

IN THE CIRCUIT COURT OF LACLEDE COUNTY, MISSOURI
ASSOCIATE CIRCUIT JUDGE DIVISION

STATE OF MISSOURI,)	
Plaintiff,)	
)	
v.)	Case No. 22LA-CR00282
)	
MARCUS JAMES HILL)	
17960 Georgia Rd.)	
Lebanon, MO 65536)	
DOB: 05/18/1987)	
White/Male, 5'11/167)	
Defendant.)	

COMPLAINT

Comes now, the Attorney General of the State of Missouri, upon information and belief, and states that there is probable cause to believe that the accused committed the following crime(s):

COUNT 1

That Marcus Hill, acting with another, in violation of Sections 407.020.1 and 407.020.3, RSMo, committed the class E felony of deceptive business practices, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about June 6, 2021 to August 31, 2021, in the County of Laclede, State of Missouri, defendant, in connection with the sale of merchandise in trade and commerce, willfully, knowingly, and with the intent to defraud, made the false promise to Richard Tiegs that in exchange for money paid, defendant would provide a 2003 Ford recreational vehicle and a certificate of ownership with assignment thereof, a representation that was false or misleading as to defendant's intention or ability to perform the promise or the likelihood the promise would be performed.

Defendant is a prior felony offender and a persistent felony offender punishable under Section 558.016, RSMo, to the authorized term of imprisonment for a class D felony in that defendant has been found guilty of two felony offenses committed at different times as follows:

On or about April 16, 2010, in the Circuit Court of Jasper County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about July 12, 2009, and

On or about January 11, 2011, in the Circuit Court of Webster County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about December 17, 2008, and

On or about July 16, 2012, in the Circuit Court of Wright County, Missouri, defendant was

found guilty of the felony offense of stealing a firearm, for events occurring on or about December 9, 2008, and

On or about April 10, 2017, in the Circuit Court of Lawrence County, Missouri, defendant was found guilty of the felony offense of receiving stolen property, for events occurring on or about December 21, 2014.

***charge code 407.020-001Y20202699.0**

COUNT 2

That Marcus Hill, acting with another, in violation of Sections 407.020.1 and 407.020.3, RSMo, committed the class E felony of deceptive business practices, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about November 1, 2020 to February 28, 2021, in the County of Laclede, State of Missouri, defendant, in connection with the sale of merchandise in trade and commerce, willfully, knowingly, and with the intent to defraud, made the false promise to Robert Pawlak that in exchange for money paid, defendant would provide a 2006 Honda Odyssey vehicle and a certificate of ownership with assignment thereof, a representation that was false or misleading as to defendant's intention or ability to perform the promise or the likelihood the promise would be performed.

Defendant is a prior felony offender and a persistent felony offender punishable under Section 558.016, RSMo, to the authorized term of imprisonment for a class D felony in that defendant has been found guilty of two felony offenses committed at different times as follows:

On or about April 16, 2010, in the Circuit Court of Jasper County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about July 12, 2009, and

On or about January 11, 2011, in the Circuit Court of Webster County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about December 17, 2008, and

On or about July 16, 2012, in the Circuit Court of Wright County, Missouri, defendant was found guilty of the felony offense of stealing a firearm, for events occurring on or about December 9, 2008, and

On or about April 10, 2017, in the Circuit Court of Lawrence County, Missouri, defendant was found guilty of the felony offense of receiving stolen property, for events occurring on or about December 21, 2014.

***charge code 407.020-001Y20202699.0**

COUNT 3

That Marcus Hill, acting with another, in violation of Sections 407.020.1 and 407.020.3, RSMo, committed the class E felony of deceptive business practices, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about November

1, 2020 to February 28, 2021, in the County of Laclede, State of Missouri, defendant, in connection with the sale of merchandise in trade and commerce, willfully, knowingly, and with the intent to defraud, made the false promise to Robert Pawlak that in exchange for money paid, defendant would provide a warranty for maintenance work needed in the next 90 days on the 2006 Honda Odyssey defendant sold to Mr. Pawlak, a representation that was false or misleading as to defendant's intention or ability to perform the promise or the likelihood the promise would be performed.

Defendant is a prior felony offender and a persistent felony offender punishable under Section 558.016, RSMo, to the authorized term of imprisonment for a class D felony in that defendant has been found guilty of two felony offenses committed at different times as follows:

On or about April 16, 2010, in the Circuit Court of Jasper County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about July 12, 2009, and

On or about January 11, 2011, in the Circuit Court of Webster County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about December 17, 2008, and

On or about July 16, 2012, in the Circuit Court of Wright County, Missouri, defendant was found guilty of the felony offense of stealing a firearm, for events occurring on or about December 9, 2008, and

On or about April 10, 2017, in the Circuit Court of Lawrence County, Missouri, defendant was found guilty of the felony offense of receiving stolen property, for events occurring on or about December 21, 2014.

***charge code 407.020-001Y20202699.0**

COUNT 4

That Marcus Hill, acting with another, in violation of Sections 407.020.1 and 407.020.3, RSMo, committed the class E felony of deceptive business practices, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about May 24, 2021 to July 31, 2021, in the County of Laclede, State of Missouri, defendant, in connection with the sale of merchandise in trade and commerce, willfully, knowingly, and with the intent to defraud, made the false promise to Sandra Graham that in exchange for money paid, defendant would provide a 2000 Ford Mustang and a certificate of ownership with assignment thereof, a representation that was false or misleading as to defendant's intention or ability to perform the promise or the likelihood the promise would be performed.

Defendant is a prior felony offender and a persistent felony offender punishable under Section 558.016, RSMo, to the authorized term of imprisonment for a class D felony in that defendant has been found guilty of two felony offenses committed at different times as follows:

On or about April 16, 2010, in the Circuit Court of Jasper County, Missouri, defendant was

found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about July 12, 2009, and

On or about January 11, 2011, in the Circuit Court of Webster County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about December 17, 2008, and

On or about July 16, 2012, in the Circuit Court of Wright County, Missouri, defendant was found guilty of the felony offense of stealing a firearm, for events occurring on or about December 9, 2008, and

On or about April 10, 2017, in the Circuit Court of Lawrence County, Missouri, defendant was found guilty of the felony offense of receiving stolen property, for events occurring on or about December 21, 2014.

***charge code 407.020-001Y20202699.0**

COUNT 5

That Marcus Hill, acting with another, in violation of Sections 407.020.1 and 407.020.3, RSMo, committed the class E felony of deceptive business practices, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about March 15, 2021 to April 30, 2021, in the County of Laclede, State of Missouri, defendant, in connection with the sale of merchandise in trade and commerce, willfully, knowingly, and with the intent to defraud, made the false promise to Cactus Seitz that in exchange for money paid, defendant would provide a 2007 Kia Spectra and a certificate of ownership with assignment thereof, a representation that was false or misleading as to defendant's intention or ability to perform the promise or the likelihood the promise would be performed.

Defendant is a prior felony offender and a persistent felony offender punishable under Section 558.016, RSMo, to the authorized term of imprisonment for a class D felony in that defendant has been found guilty of two felony offenses committed at different times as follows:

On or about April 16, 2010, in the Circuit Court of Jasper County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about July 12, 2009, and

On or about January 11, 2011, in the Circuit Court of Webster County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about December 17, 2008, and

On or about July 16, 2012, in the Circuit Court of Wright County, Missouri, defendant was found guilty of the felony offense of stealing a firearm, for events occurring on or about December 9, 2008, and

On or about April 10, 2017, in the Circuit Court of Lawrence County, Missouri, defendant was found guilty of the felony offense of receiving stolen property, for events occurring on or about December 21, 2014.

***charge code 407.020-001Y20202699.0**

COUNT 6

That Marcus Hill, acting with another, in violation of Sections 407.020.1 and 407.020.3, RSMo, committed the class E felony of deceptive business practices, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or around January 1, 2021 to June 30, 2021, in the County of Laclede, State of Missouri, defendant, in connection with the sale of merchandise in trade and commerce, willfully, knowingly, and with the intent to defraud, made the false promise to Carolyn Quick that in exchange for a 2002 Dodge Ram truck, defendant would provide a 2015 Chevy Cruze and a certificate of ownership with assignment thereof, a representation that was false or misleading as to defendant's intention or ability to perform the promise or the likelihood the promise would be performed.

Defendant is a prior felony offender and a persistent felony offender punishable under Section 558.016, RSMo, to the authorized term of imprisonment for a class D felony in that defendant has been found guilty of two felony offenses committed at different times as follows:

On or about April 16, 2010, in the Circuit Court of Jasper County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about July 12, 2009, and

On or about January 11, 2011, in the Circuit Court of Webster County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about December 17, 2008, and

On or about July 16, 2012, in the Circuit Court of Wright County, Missouri, defendant was found guilty of the felony offense of stealing a firearm, for events occurring on or about December 9, 2008, and

On or about April 10, 2017, in the Circuit Court of Lawrence County, Missouri, defendant was found guilty of the felony offense of receiving stolen property, for events occurring on or about December 21, 2014.

***charge code 407.020-001Y20202699.0**

COUNT 7

That Marcus Hill, acting with another, in violation of Sections 407.020.1 and 407.020.3, RSMo, committed the class E felony of deceptive business practices, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about March 13, 2021 to July 31, 2021, in the County of Laclede, State of Missouri, defendant, in connection with the sale of merchandise in trade and commerce, willfully, knowingly, and

with the intent to defraud, made the false promise to Jessie McConnaughey that in exchange for money paid, defendant would provide a 2007 Buick Terraza and a certificate of ownership with assignment thereof, a representation that was false or misleading as to defendant's intention or ability to perform the promise or the likelihood the promise would be performed.

Defendant is a prior felony offender and a persistent felony offender punishable under Section 558.016, RSMo, to the authorized term of imprisonment for a class D felony in that defendant has been found guilty of two felony offenses committed at different times as follows:

On or about April 16, 2010, in the Circuit Court of Jasper County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about July 12, 2009, and

On or about January 11, 2011, in the Circuit Court of Webster County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about December 17, 2008, and

On or about July 16, 2012, in the Circuit Court of Wright County, Missouri, defendant was found guilty of the felony offense of stealing a firearm, for events occurring on or about December 9, 2008, and

On or about April 10, 2017, in the Circuit Court of Lawrence County, Missouri, defendant was found guilty of the felony offense of receiving stolen property, for events occurring on or about December 21, 2014.

***charge code 407.020-001Y20202699.0**

COUNT 8

That Marcus Hill, acting with another, in violation of Sections 407.020.1 and 407.020.3, RSMo, committed the class E felony of deceptive business practices, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about March 13, 2021 to July 31, 2021, in the County of Laclede, State of Missouri, defendant, in connection with the sale of merchandise in trade and commerce, willfully, knowingly, and with the intent to defraud, made the false promise to Beau Henson that in exchange for money paid, defendant would provide a 2008 Ford Ranger and a certificate of ownership with assignment thereof, a representation that was false or misleading as to defendant's intention or ability to perform the promise or the likelihood the promise would be performed.

Defendant is a prior felony offender and a persistent felony offender punishable under Section 558.016, RSMo, to the authorized term of imprisonment for a class D felony in that defendant has been found guilty of two felony offenses committed at different times as follows:

On or about April 16, 2010, in the Circuit Court of Jasper County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or

about July 12, 2009, and

On or about January 11, 2011, in the Circuit Court of Webster County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about December 17, 2008, and

On or about July 16, 2012, in the Circuit Court of Wright County, Missouri, defendant was found guilty of the felony offense of stealing a firearm, for events occurring on or about December 9, 2008, and

On or about April 10, 2017, in the Circuit Court of Lawrence County, Missouri, defendant was found guilty of the felony offense of receiving stolen property, for events occurring on or about December 21, 2014.

***charge code 407.020-001Y20202699.0**

COUNT 9

That Marcus Hill, acting with another, in violation of Sections 407.020.1 and 407.020.3, RSMo, committed the class E felony of deceptive business practices, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about March 1, 2021 to July 31, 2021, in the County of Laclede, State of Missouri, defendant, in connection with the sale of merchandise in trade and commerce, willfully, knowingly, and with the intent to defraud, made the false promise to Amber Bass that in exchange for money paid, defendant would provide a 2012 Chevy Equinox and a certificate of ownership with assignment thereof, a representation that was false or misleading as to defendant's intention or ability to perform the promise or the likelihood the promise would be performed.

Defendant is a prior felony offender and a persistent felony offender punishable under Section 558.016, RSMo, to the authorized term of imprisonment for a class D felony in that defendant has been found guilty of two felony offenses committed at different times as follows:

On or about April 16, 2010, in the Circuit Court of Jasper County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about July 12, 2009, and

On or about January 11, 2011, in the Circuit Court of Webster County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about December 17, 2008, and

On or about July 16, 2012, in the Circuit Court of Wright County, Missouri, defendant was found guilty of the felony offense of stealing a firearm, for events occurring on or about December 9, 2008, and

On or about April 10, 2017, in the Circuit Court of Lawrence County, Missouri, defendant was found guilty of the felony offense of receiving stolen property, for events occurring on or about December 21, 2014.

***charge code 407.020-001Y20202699.0**

COUNT 10

That Marcus Hill, acting with another, in violation of Sections 407.020.1 and 407.020.3, RSMo, committed the class E felony of deceptive business practices, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about March 13, 2021 to August 2021, in the County of Laclede, State of Missouri, defendant, in connection with the sale of merchandise in trade and commerce, willfully, knowingly, and with the intent to defraud, made the false promise to Justin Booyer that in exchange for money paid and a 1991 GMC Sierra, defendant would provide a 2005 Dodge Ram and a certificate of ownership with assignment thereof, a representation that was false or misleading as to defendant's intention or ability to perform the promise or the likelihood the promise would be performed.

Defendant is a prior felony offender and a persistent felony offender punishable under Section 558.016, RSMo, to the authorized term of imprisonment for a class D felony in that defendant has been found guilty of two felony offenses committed at different times as follows:

On or about April 16, 2010, in the Circuit Court of Jasper County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about July 12, 2009, and

On or about January 11, 2011, in the Circuit Court of Webster County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about December 17, 2008, and

On or about July 16, 2012, in the Circuit Court of Wright County, Missouri, defendant was found guilty of the felony offense of stealing a firearm, for events occurring on or about December 9, 2008, and

On or about April 10, 2017, in the Circuit Court of Lawrence County, Missouri, defendant was found guilty of the felony offense of receiving stolen property, for events occurring on or about December 21, 2014.

***charge code 407.020-001Y20202699.0**

COUNT 11

That Marcus Hill, acting with another, in violation of Sections 407.020.1 and 407.020.3, RSMo, committed the class E felony of deceptive business practices, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about June 24, 2020 to July 31, 2021, in the County of Laclede, State of Missouri, defendant, in connection with the sale of merchandise in trade and commerce, willfully, knowingly, and with the intent to defraud, made the false promise to Leslie Naumann and/or Scott Naumann that in exchange for money paid, defendant would provide a warranty for maintenance work needed in the next two years on a 2005 Volkswagen Jetta defendant sold to Leslie Naumann and/or Scott Naumann, a representation that was false or misleading as to defendant's intention or ability to perform the promise or the likelihood the promise would be performed.

Defendant is a prior felony offender and a persistent felony offender punishable under Section 558.016, RSMo, to the authorized term of imprisonment for a class D felony in that defendant has been found guilty of two felony offenses committed at different times as follows:

On or about April 16, 2010, in the Circuit Court of Jasper County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about July 12, 2009, and

On or about January 11, 2011, in the Circuit Court of Webster County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about December 17, 2008, and

On or about July 16, 2012, in the Circuit Court of Wright County, Missouri, defendant was found guilty of the felony offense of stealing a firearm, for events occurring on or about December 9, 2008, and

On or about April 10, 2017, in the Circuit Court of Lawrence County, Missouri, defendant was found guilty of the felony offense of receiving stolen property, for events occurring on or about December 21, 2014.

***charge code 407.020-001Y20172699.0**

COUNT 12

That Marcus Hill, acting with another, in violation of Sections 407.020.1 and 407.020.3, RSMo, committed the class E felony of deceptive business practices, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about February 15, 2021 to March 18, 2021, in the County of Laclede, State of Missouri, defendant, in connection with the sale of merchandise in trade and commerce, willfully, knowingly, and with the intent to defraud, made the false promise to Audrey Hill and/or Chad Kibodeaux that in exchange for money paid, defendant would provide a warranty for maintenance work needed in the next 90 days on a 2014 Nissan Rogue defendant sold to Audrey Hill and/or Chad Kibodeaux, a representation that was false or misleading as to defendant's intention or ability to perform the promise or the likelihood the promise would be performed.

Defendant is a prior felony offender and a persistent felony offender punishable under Section 558.016, RSMo, to the authorized term of imprisonment for a class D felony in that defendant has been found guilty of two felony offenses committed at different times as follows:

On or about April 16, 2010, in the Circuit Court of Jasper County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about July 12, 2009, and

On or about January 11, 2011, in the Circuit Court of Webster County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about December 17, 2008, and

On or about July 16, 2012, in the Circuit Court of Wright County, Missouri, defendant was found guilty of the felony offense of stealing a firearm, for events occurring on or about December 9, 2008, and

On or about April 10, 2017, in the Circuit Court of Lawrence County, Missouri, defendant was found guilty of the felony offense of receiving stolen property, for events occurring on or about December 21, 2014.

***charge code 407.020-001Y20202699.0**

COUNT 13

That Marcus Hill, acting with another, in violation of Sections 407.020.1 and 407.020.3, RSMo, committed the class E felony of deceptive business practices, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about December 29, 2020 to March 17, 2021, in the County of Laclede, State of Missouri, defendant, in connection with the sale of merchandise in trade and commerce, willfully, knowingly, and with the intent to defraud, made the false promise to Rena Rubles that in exchange for money paid, defendant would provide a warranty for maintenance work needed in the next 90 days on a 2010 Chevy Traverse defendant sold to Ms. Rubles, a representation that was false or misleading as to defendant's intention or ability to perform the promise or the likelihood the promise would be performed.

Defendant is a prior felony offender and a persistent felony offender punishable under Section 558.016, RSMo, to the authorized term of imprisonment for a class D felony in that defendant has been found guilty of two felony offenses committed at different times as follows:

On or about April 16, 2010, in the Circuit Court of Jasper County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about July 12, 2009, and

On or about January 11, 2011, in the Circuit Court of Webster County, Missouri, defendant was found guilty of the felony offense of burglary – 2nd degree, for events occurring on or about December 17, 2008, and

On or about July 16, 2012, in the Circuit Court of Wright County, Missouri, defendant was found guilty of the felony offense of stealing a firearm, for events occurring on or about December 9, 2008, and

On or about April 10, 2017, in the Circuit Court of Lawrence County, Missouri, defendant was found guilty of the felony offense of receiving stolen property, for events occurring on or about December 21, 2014.

***charge code 407.020-001Y20202699.0**

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts concerning this matter, which statement(s) are made a part hereof and are submitted as a basis upon which this court may find the existence of probable cause.

WHEREFORE the State requests that a summons be issued as provided by law.

Respectfully submitted,
ERIC S. SCHMITT
Attorney General

/s/ Robert J. Schaeffer

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STATE VS. MARCUS JAMES HILL